

WILMER MECHLIN and : IN THE
LULA D. MECHLIN, his wife, :
Plaintiffs, : CIRCUIT COURT
vs. : FOR
DAISY BELCHER et. al., : FREDERICK COUNTY
Defendants. :
: 2529 - E - Civil

MOTION FOR SUMMARY JUDGMENT


Now comes Wilmer Mechlin and Lula Mechlin by James H. Clapp, their attorney, and pursuant to Maryland Rule 2-501, move for summary judgment in their favor against the Defendants.

As is more fully set forth in the Complaint to Quiet Title, and Affidavit attached thereto, and for there being no answer filed on behalf of any of the Defendants, there is no genuine dispute as to any material fact and Plaintiffs are entitled to a judgment as a matter of law because:

1. Plaintiffs are in constructive and peaceable possession of the said vacant and unoccupied land described in this proceeding, pursuant to a deed from Elmer Shamwell, et.al. dated September 28, 1977 and recorded in Liber 1032, folio 304, one of the Land Records of Frederick County, Maryland, and are entitled to maintain this suit in Equity in Frederick County where the said property lies in order to remove any clouds from the title to said property pursuant to Section 14-108 of the Real Property Article of the Annotated Code of Maryland.

FILED

DEC 30 11 11 AM '86


James H. Clapp
124 North Court Street
Frederick, Maryland, 21701
301-663-8100